

Tx 11843

DEC 30 1985

Major Don Michael Bradford
Director, Environmental Planning Division
Air Force Regional Civil Engineer
Central Region
1114 Commerce Street
Dallas, Texas 75242

DYESS AFB
TX 3571924643

Dear Major Bradford:

We appreciate the opportunity to review the Phase I IRP report for Dyess AFB, Texas. We offer the following comments and requests regarding our review:

1. Please describe any leak detection program practiced at Dyers AFB to ensure adequate monitoring of the suitability of the underground storage tanks for liquid containment.
2. Please note the contouring error on p. 3-19 which shows a 4.5 foot isopach point between the 5 and 10 foot thickness contours.
3. Please provide for our information a representative set of the surface water quality results for Little Elm Creek, as mentioned on p. 3-27.
4. We are concerned about the reliance on indicator parameters as described in Table 6.1. Indicator parameters only reflect gross contamination and are of no use in detecting low concentrations of hazardous materials. Detailed analyses of groundwater and soil samples at each site are recommended.
5. Given the past uses of the evaporation pit and landfill, analysis for volatile and semivolatile organics, including pesticides, is warranted. Also, analysis of PCB is proposed for groundwater, but not for sediment. This sampling protocol contradicts the physical/chemical characteristics of PCB. Analysis of sediment samples for PCB should be included. Finally, the EP toxicity testing program for this site should include the pesticide fraction as well as metals.

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6. Given the past waste disposal practices at FPTA 1, consideration should be given to the installation of monitoring wells during the initial stage of the Phase II effort.

Should you have any questions regarding our review, please contact Greg McCabe at (214) 767-9712.

Sincerely,

Robert E. Hanneschlager, P.E., Chief
Superfund Enforcement Branch

cc: Douglas Jansing

bcc: TX 11843
Jim Highland, 6E-FF